

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking to Implement the
Commission's Procurement Incentive
Framework and to Examine the Integration of
Greenhouse Gas Emissions Standards into
Procurement Policies.

Rulemaking 06-04-009

**COMMENTS OF PACIFIC GAS AND ELECTRIC
COMPANY (U 39 E) ON DRAFT WORKSHOP REPORT**

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Dated: September 8, 2006

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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Implement the Commission's Procurement Incentive Framework and to Examine the Integration of Greenhouse Gas Emissions Standards into Procurement Policies.

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I. INTRODUCTION

Pursuant to the August 21 and 28, 2006, Administrative Law Judge's Rulings and the August 21, 2006, directions by the Commission's Division of Strategic Planning (DSP), Pacific Gas and Electric Company (PG&E) submits its comments on the August 21, 2006 Draft Workshop Report ("Draft Report") on Phase 1 issues regarding a greenhouse gas emissions performance standard (EPS) in this proceeding. For the convenience of the Commission and the parties and as requested by Commission staff, PG&E's comments respond primarily to Sections VI.B. (Implementation/Design) of the Draft Report.^{1/} In addition, PG&E notes that several of the topics and principles discussed in the Draft Report have been the subject of PG&E's prior comments in this proceeding, including PG&E's pre-workshop and post-workshop comments filed on June 12, 2006 and July 27, 2006, respectively. Therefore, PG&E recommends that its comments on the Draft Report be considered in conjunction with its other comments as well as its presentation and comments at the workshops themselves.

^{1/} PG&E is not providing extensive comments on other sections of the Draft Report because those sections largely summarize the written and oral submissions of the parties and workshops themselves. PG&E has not identified any significant errors or misstatements in those sections.

PG&E continues to commend and express appreciation to the Commission staff, including the Division of Strategic Planning staff, for assembling into the Draft Report a detailed and comprehensive summary of issues and views relating to the structure and applicability of a greenhouse gas (GHG) emissions performance standard (EPS). PG&E believes that, by and large, the Draft Report is an excellent, fair and complete summary of the key issues associated with the EPS.

II. OVERLAY OF SB 1368 AND AB 32

Prior to responding to specific issues in the Draft Report, PG&E notes that the Draft Report was issued prior to passage of AB 32 and SB 1368 by the Legislature, two bills that directly affect the Commission's authority and policies in this proceeding. For purposes of its comments, PG&E is assuming that the Governor signs both AB 32 and SB 1368 and therefore both go into law and govern in whole or part the Commission's actions in this proceeding. Based on this assumption, PG&E has the following substantive and procedural comments on how these new laws would "overlay" the Commission's next steps here.

A. Procedural Implications of SB 1368

SB 1368 provides some procedural guidance and deadlines that the Commission would need to consider in this proceeding. For example, new Public Utilities Code section 8341(d)(1) would require the Commission to consult with the Air Resources Board and the Energy Commission before promulgating an EPS. In addition, new Public Utilities Code section 8341(d)(6) would require the Commission to consult with the California Independent System Operator on reliability and overall costs to customers. It is not clear how the Commission would incorporate these formal consultation requirements into its current procedural schedule, and therefore PGE& recommends that the Commission issue an ALJ's or Assigned Commissioner's

ruling providing guidance to parties and to the ARB, Energy Commission and CAISO.

B. Substantive Implications of SB 1368 and AB 32

SB 1368 includes several key provisions which dictate or resolve implementation and legal issues discussed in the Draft Report, such as jurisdiction over electric service providers and deemed compliance of existing combined cycle gas turbine facilities with an EPS. PG&E's comments below will note these provisions of SB 1368 where applicable. In addition, SB 1368 would require the Commission to "continue, modify, or replace" its EPS upon adoption of any other greenhouse gas emissions limit applicable to load-serving entities. (new Public Utilities Code section 8341(g).) In turn, AB 32 requires the Air Resources Board to establish greenhouse gas emissions limits applicable to sources by January 1, 2012, and to consult with the Commission on the effects of those limits on energy related matters prior to issuing a scoping plan for the new limits by January 1, 2009. (new Health and Safety Code sections 38561(a) and 38562(a).) Furthermore, the Air Resources Board is required to consult with the Commission on its regulations in order to "minimize duplicative or inconsistent regulatory requirements" applicable to electricity and natural gas providers. (new Health and Safety Code section 38562(f).).

PG&E believes that the inter-action of the new substantive and procedural requirements of SB 1368 and AB 32, especially regarding the different responsibilities of the Commission, the Air Resources Board, the Energy Commission and the CAISO, need to be carefully considered as the Commission moves forward with an interim EPS in this proceeding.

III. COMMENTS ON DRAFT WORKSHOP REPORT

Comments on Section VI.B. Implementation and Design.

Questions 1 and 2: Threshold Issue: Should the Commission adopt an interim EPS?

PG&E COMMENT: Assuming SB 1368 is signed into law, PG&E believes that the Commission is obligated by law to promulgate an EPS.

Question 3: Assuming that the Commission decides to proceed with an interim EPS, what should be the major design principles/objectives for such a standard?

PG&E COMMENT: PG&E generally agrees with the priorities listed in the Draft Report, consistent with PG&E's earlier comments in this proceeding, and subject to the need for the Commission to adjust the priorities consistent with the procedural and substantive requirements of SB 1368 and AB 32.

Question 4. Please discuss the relative advantages of the "gateway" approach to an EPS, and the potential disadvantages. If you propose an alternative, please describe.

PG&E COMMENT: As discussed in its previous comments, PG&E agrees with the "gateway" standard included in the Draft Report, subject to more up-front specificity on the documentation required to demonstrate compliance (see Question 18, below). As stated in PG&E's June 12 pre-workshop comments, the EPS should be applied only at the time of each load serving entity's (LSE's) decision to procure, certify or legally commit to a baseload generating facility or contract subject to the EPS. Compliance would be demonstrated up-front, at that time only, through documentation of the facility's full load heat rate and expected capacity factor, so that there would be regulatory certainty and predictability for the LSE, the Commission and the LSE's customers generally.

Question 5. The Staff Straw Proposal applies the EPS to new *commitments*

(construction, repowering, new or renewal contracts). Please comment on whether you support the Staff Straw Proposal on this issue, indicating your views on the relative advantages and disadvantages of applying the EPS to both new and existing generation facilities (under new commitments). Relate your response to this question to the design priorities you articulate under question #3 above.

PG&E COMMENT: SB 1368 would resolve this question in part, because it provides that “All combined-cycle natural gas powerplants [CCGTs] that are in operation, or that have an Energy Commission final permit decision to operate as of June 30, 2007, shall be deemed to be in compliance with the greenhouse gases emission performance standard.” (new Public Utilities Code section 8341(d)(1).) In terms of what would constitute “new construction” or “repowering” that would change an existing facility to a facility that is not an “existing” facility, PG&E recommends that only those changes to a powerplant that result in a net increase in the rated capacity of the plant be considered as changing the status of the facility from being deemed in compliance to being required to demonstrate compliance. This is consistent with the “grandfathering” policy for existing CCGTs in SB 1368 and with the need to monitor changes in an existing powerplant that would increase the intended level of greenhouse gas emissions from the facility.

Question 6. Should the EPS cover only commitments (construction or contracts) of five years or longer as the workshop participants generally agreed?

PG&E COMMENT: SB 1368 has resolved this issue, by requiring the EPS to apply only to “a new or renewed contract with a term of five or more years, which includes procurement of baseload generation.” (SB 1368, new Public Utilities Code section 8340(j).)

Question 7. Another major design issue discussed at workshops was what the

Commission should look at (contract or facility operation) in determining whether the EPS applies. In particular, should the Commission (1) look at the operation of the facility underlying a contract, or (2) only to the amount/product contracted for by the LSE? and your position on this issue.

PG&E COMMENT:

Specified Contracts:

Where long-term, baseload contracts of 25 MW or greater identify specific units, PG&E agrees that the forecast capacity factor and the heat rate at ISO conditions of the particular unit should be used for the EPS. PG&E further agrees with the Draft Report that the EPS would not apply to those units whose capacity factor is less than 60% regardless of the type of contract. Therefore, peaking units named for reliability and back-up purposes in a baseload contract would be screened using the expected capacity factor of the unit, rather than the contract. To be consistent with SB1368, CCGTs in operation or with a final permit decision to operate as of June 30, 2007 would be deemed compliant with the EPS. Documentation for compliance is discussed below under Question 18.

Unspecified contracts:

For contracts 25 MW or above which do not specify particular units, if the contract references a contract heat rate, then this contract heat rate should be used to establish compliance with the EPS. If the contract does not establish a contract heat rate, then the contract emissions rates should be imputed using the methodology described below under Question 15.

All commitments (specified and unspecified):

PG&E supports the staff's proposal to not apply the EPS to de minimus contracts of less than 25 MW and concurs with the establishment of rules to avoid "gaming." If an LSE enters

into a simultaneous series of contracts with a unit which increase the capacity factor, contract length, or contract size above 25 MW, then these contracts should be treated as one financial commitment with the unit.

Question 8. There was general agreement during the workshop that an interim EPS should *not* apply to peaking facilities or resources expected to operate relatively few hours during the year. Accordingly, the Staff Straw Proposal uses a definition for “covered resources” as those with an annual average capacity factor of 60% or greater, intending to cover resources operating as year-round base load and high-use intermediate and shaping facilities. Do you believe that this definition of covered resources is appropriate? In responding, please address the following:

a. What types of resources do you believe the EPS should cover and whether you believe the straw proposal capacity factor (60% or greater) metric to define a covered resource will capture those resources.

b. Present an alternative metric(s) for defining “covered resources” that you recommend, if you do not support the Staff Straw Proposal definition.

c. Whether (and if so, how) the EPS should incorporate a research and development exemption for advanced coal or other technologies.

PG&E COMMENT: SB 1368 has resolved this issue by applying the EPS only to baseload generation, which is defined as “electricity generation from a powerplant that is designed and intended to provide electricity at an annualized plant capacity factor of at least 60 percent.” (SB 1368, new Public Utilities Code section 8340(a).) PG&E supports allowing an exemption from the EPS for advanced coal or other GHG-reducing technologies, to be considered and granted on a case-by-case basis.

Question 9. Another design issue discussed at the workshop was how the EPS should apply to specified contracts with more than one underlying covered resource (new or existing): Should the Commission apply the EPS to the “blend” of the resources/units, or require that each covered resource meet the EPS individually?

Under the Staff Straw Proposal, each individual covered resource must meet the EPS, with the exception of a renewable contract firmed with a non-renewable resource. In that case, the blend of the two must meet the EPS, rather than the individual resources/units.

PG&E COMMENT:

For contracts which are a blend of specific units or facilities, PG&E agrees with the Draft Report’s recommendation to using the design heat rate and forecast capacity factor for each unit or facility, as information is available. However, with regard to a renewable contract firmed with a non-renewable resource, PG&E disagrees with the Draft Report’s “blending” requirements and continues to recommend that RPS-eligible resources be categorically deemed in compliance with the EPS, without regard to the characteristics of any firming non-renewable resource behind the RPS-eligible resource. It is PG&E’s hope that 100% of the energy delivered through these contracts could be tied back to a renewable resource. The purpose of having the system or non-renewable electricity as a back-up resource is to remove operational hurdles to completing new contracts with RPS-eligible resources. While PG&E believes that “firmed” renewable commitments would meet the EPS, PG&E advocates exempting these contracts to reduce administrative barriers for RPS-eligible resources.

Question 10. In the context of the Staff Straw Proposal, how should the Commission treat partial contracts under the proposed EPS?

PG&E COMMENT: PG&E agrees with the Draft Report's recommendation that partial year contracts not be covered by the EPS. PG&E believes the 60% capacity factor should be and is required by SB 1368 to be applied on an annual, not seasonal, basis. (See SB 1368, new Public Utilities Code section 8340(a), (l).) To calculate the 60% capacity factor on a seasonal basis blurs the distinction between baseload and peaking products, and may inadvertently take away important contractual alternatives for providing reasonable energy supplies at reasonable cost.

Question 11. The Staff Straw Proposal allows for an exemption from the standard for specified units of 25 MW or smaller, based on the size of the facility under construction or providing power under a contract. However, there would be no size exemption for unspecified contracts of any size. In commenting on this aspect of the Straw Proposal, please address the following:

- a. The MW level of the “small unit” exemption under this proposal.**
- b. Basing the exemption on MWs delivered to the grid. In determining eligibility for the size exemption, the Staff Straw Proposal would subtract out self-generated power that was not delivered to the grid.**
 - i. Please indicate whether you agree with this approach to determining the size exemption, why or why not?**
 - ii. If the Commission adopts this approach, what type of information (and source of data) would need to be presented for the Commission to determine the amount of expected self-generation to subtract from the unit size?**
- c. Basing the exemption on the size of the unit being constructed or underlying a unit-specified contract, rather than the size of the contract.**

d. No size exemption for any unspecified contracts. Do you support this approach?

Why or why not?

PG&E COMMENT: PG&E agrees with the Draft Report's recommended threshold of greater than 25 MW for both specified and unspecified contracts, with the emissions factor for unspecified contracts imputed based upon the contract size rather than the emissions rates of the underlying facilities. PG&E also supports the Draft Report's proposal that the exemption be based on MWs delivered to the grid, and that any thermal credit for self-generation resources be demonstrated on a case-by-case basis.

Question 12. Under the Staff Straw Proposal, the Commission would develop two separate standards for covered resources: 1) a “moderate” EPS to apply to existing resources and repowering and 2) a “high” EPS to apply to new resources. Both would be based on the performance of a combined-cycle gas turbine (CCGT). Please address the following questions in your comments on this approach:

a. Do you agree in concept with a dual standard as outlined in the Staff Straw Proposal, why or why not?

b. If the Commission adopted this approach, what performance standard do you recommend for the “moderate” and “high” EPS? Express your answer in terms of heat rates as a proxy for GHG emission rates. Explain why you chose these levels, and the source of data/calculations you used to develop them.

c. If instead you recommend a single EPS based on the performance of a CCGT for all new commitments (whether to new resources, existing or repowered facilities), provide your recommended performance standard (expressed as a heat rate), explain why you chose this level, and the source of data/calculations you used to develop it.

d. In responding to b. and c. above, be specific as to how you developed your CCGT reference standard and the data sources/calculations used. For example, did you base it on the expected performance of a modern CCGT newly placed in service, or at the end of its useful life, or an average of emissions from existing CCGTs, or another approach?

e. If you have alternate or additional recommendations for the EPS standard and calculation, please submit them.

PG&E COMMENT: PG&E agrees with the Draft Report's recommendation that a single EPS be adopted, applicable to all covered resources. As stated in its post-workshop comments, PG&E believes that the numerical standard set for the EPS must be examined in the context of balancing the key policy goal of "no backsliding" with the equally important goal of ensuring reliable resources at reasonable cost. The numerical standard should also be consistent with other goals, such as maintaining and enhancing the reliability of the grid, meeting resource adequacy requirements, following the preferred loading order, and incenting utilities and other LSEs to procure and dispatch a diverse portfolio of both short term and long term resources on a least-cost basis. PG&E believes that the standard chosen by the staff of 1,000 lbs CO₂/MWh is too stringent to meet all of the policy goals enumerated above.

As shown in data provided by the parties to the staff, as a class, CCGTs have emissions up to roughly 1,020 lbs CO₂/MWh. Based on the mmBtus consumed by CCGTs in California in 2004 and 2005 as reported in the CEC Continuous Emissions Monitoring System (CEMS) database, CCGTs with capacity factors above 60% had emissions as high as 1,006 lbs CO₂/MWh. Additional data from the CEC dating back to 2000 for all CCGTs in the WECC

show several facilities with high capacity factors and with emissions rates higher than or close to 1,000 lbs CO₂/MWh.^{2/}

Plant Name	State	Unit	Year	Avg Total mmBtu	Sum Net Generation MWh	Wtd Avg Capacity Factor %	Sum Total CO ₂ million lbs	CO ₂ lbs/M WH
Coolwater Gen Station	CA	CC4	2000	14754584	1452230	72	1,754	1,208
Coolwater Gen Station	CA	CC3	2001	13339087	1531963.3	76	1,585	1,035
Delta Energy Center	CA	CC1	2002	19862577	2404233.7	67	2,370	986
Delta Energy Center	CA	CC1	2003	36610940	4321437.5	61	4,351	1,007
Delta Energy Center	CA	CC1	2004	39676737	4680464.2	66	4,716	1,008
Fort St Vrain	CO	CC	2001	32098614	3756738.3	62	3,815	1,016
Fort St Vrain	CO	CC	2002	38838428	4605830	76	4,616	1,002
West Phoenix	AZ	CC1	2001	3306952	395743.22	77	393	993

Based on this information and the need to maintain reliability with shaping, intermediate resources with efficient heat rates, PG&E supports the standard of 1,100 lbs CO₂/MWh proposed by NRDC, TURN, UCS, GPI, and SDG&E, not 1,000 lbs CO₂/MWH as recommended by the Draft Report. The 1,100 lb standard would prevent “backsliding” while at the same time taking into account intermediate units, including reciprocating engine units, that will be needed for reliable operation of the grid, including integration of renewables, and that may have emissions rates slightly above the average for CCGTs included in the “Spreadsheet of existing emissions rates” cited by the Draft Report in support of the 1,000 lb standard.

Question 13. There was general agreement at the workshop that the Commission should allow credit for cogeneration thermal load when applying the EPS to covered resources. This is reflected in the Staff Straw Proposal. Do you agree with this approach, why or why not?

PG&E COMMENT: PG&E agrees with the Draft Report’s recommendation that

^{2/} Provided in an email from Karen Griffin to various parties in the proceeding and Lainie Motamedi of the DSP staff on June 29, 2006.

emissions credits for thermal side of cogeneration facilities be reviewed and approved on a case-by-case basis.

Question 14. Do you have a position on how to calculate the net emission rates from renewables (e.g., for waste-to-energy, geothermal resources) for the purpose of applying the EPS?

PG&E COMMENT: PG&E agrees with the Draft Report’s recommendation that all renewables be assigned an emissions factor of zero for purposes of compliance with the EPS.

Question 15. There was discussion during the workshop on how to address unspecified contracts, i.e., what imputed emissions factor to use. The following alternatives were identified:

- a. Western Energy Coordinating Council (WECC) system average;**
- b. Appropriate geographic average (e.g., Northwest purchases represent different resources than purchases from the Southwest);**
- c. California Energy Commission (CEC) “Net System Power” calculations;**
- d. Default to coal emission rates.**

Please discuss your recommended approach, and why. Be as specific as possible as to the source of the data (or specific numbers) you would use for this purpose.

PG&E COMMENT: The purpose of the EPS is to send a financial signal for LSEs to enter into long-term, baseload contracts with less GHG-intensive resources. LSEs, regardless of location within California, are able to import electricity from both the Pacific Northwest and the Desert Southwest. An LSE’s geographic location does not restrict its ability to enter into a contract for electricity from the Pacific Northwest. By not distinguishing the resource mix of imports by region, the Draft Report dilutes the emissions of more GHG-intensive electricity

imported from the Desert Southwest, perhaps perversely incenting imports of more GHG-intensive system resources. Therefore, where system purchases can be attributed to the Pacific Northwest or the Desert Southwest, the emissions associated with these purchases should be calculated using either an appropriate geographic average.

The CEC has invested significant time and effort in developing a methodology for estimating emissions associated with electricity imports. PG&E recommends using this methodology, described in the May 2006 draft CEC whitepaper, for estimating imports. Where system purchases cannot be attributed to any region, PG&E supports the use of the CEC's most current Net System Power annual calculation.

Question 16. The Staff Straw Proposal does not include offsets or market price safety valves under the interim EPS, but does provide for a case-by-case reliability “safety valve” review by the Commission. (See Appendix A). Please comment on this aspect of the proposal, and provide your recommendations.

PG&E COMMENT: PG&E supports the Draft Report's endorsement of a case-by-case exemption for resources needed for reliability purposes. The exemption should be described more precisely as available where an LSE can demonstrate that compliance with the EPS would be inconsistent with or prevent the LSE (or its counter-party in the case of a procurement contract or commitment) from meeting the reliability standards established by the California Independent System Operator under its tariffs as well as federal and state regulations and statutes. If such a conflict is demonstrated, the Commission should grant the exemption. In addition, consistent with the interim nature of the EPS and the “safety valve” provisions of AB 32's “cap and trade” program, PG&E recommends that the EPS include an opportunity for a case-by-case exemption to be granted for a specific facility or procurement contract if the LSE

demonstrates that the exemption is needed in order to avoid severe economic impacts or electricity market disruption to the detriment of retail electricity customers.

Question 17. From a policy perspective, please discuss whether energy service providers, qualifying facilities (QFs) and other jurisdictional load-serving entities (LSEs), including multi-jurisdictional utilities, should be subject to an interim EPS along with PG&E, SCE and SDG&E, should the Commission decide to adopt one.

PG&E COMMENT: SB 1368 has resolved this issue, by applying the EPS to all load-serving entities and local publicly owned utilities serving end-use customers in the state. (See SB 1368, new Public Utilities Code sections 8340(h), (i); 8341(a), (d), (e).)

If you have considered the issue of how the Commission would apply an interim EPS to multi-jurisdictional utilities, please present a protocol for allocating emissions among resources serving multiple states with your post-workshop comments.

PG&E COMMENT: SB 1368 has resolved this issue. (See SB 1368, new Public Utilities Code section 8341(d)(9).)

Question 18. If the Commission adopted an interim gateway EPS modeled after the Staff Straw Proposal, what documentation should it require “at the gate” with respect to 1) meeting the small size exemption, including amount of power delivered to the grid (for self-generation), 2) demonstrating whether the new commitment meets the “covered resource” definition or not, 3) claiming the cogeneration thermal load credit and 3) other requirements of the EPS?

Should there also be compliance requirements under this gateway approach (e.g., with respect to unspecified contracts), and if so, what should they be?

PG&E COMMENT: The Draft Report recommends that compliance with the “gateway standard” be demonstrated by using “independently verified emissions data” such as from the California Climate Action Registry (CCAR). PG&E does not disagree that documentation of compliance should be verifiable and objective, but does not believe the CCAR data provides relevant or sufficient documentation. Instead, consistent with our prior comments, PG&E recommends that the EPS rule direct LSEs to demonstrate compliance with the capacity factor “screen” by documenting the forecast capacity factor of the unit under contract when seeking approval for the new long term commitment. Compliance with the EPS for those facilities that fall under the regulation should be demonstrated at the time of application and determined by documentation of the full load heat rate under ISO conditions, with provisions for dry cooling. The method for demonstrating whether a resource meets the covered definition or not should be consistent with the method used to evaluate the product in the procurement process, e.g. the spread option methodology.

Emissions of carbon dioxide from the facility should be based on pounds of emissions per megawatt hour (lb/MWh) at full load design (ISO) conditions. LSEs should supply this information at the time of the application to the PUC for approval of the commitment or contract, and could request that any commercially-sensitive information be subject to an appropriate protective order or non-disclosure agreement, as is the case with other commercially-sensitive procurement-related information.

The level and kind of documentation sufficient for each long term commitment or facility may vary from case to case, based on both the contract terms and the actual facility or facilities supporting the contract, and so PG&E recommends that the EPS not adopt a “one size fits all” rule for the documentation. Instead, consistent with the guidelines above, the LSE should

provide its documentation to the Procurement Review Group (as applicable) and to Commission staff, and the Commission staff should be delegated the authority to approve the documentation through an advice filing, unless the facility or contract is subject to approval by formal application at the Commission. For administrative simplicity during the initial implementation of the EPS, PG&E recommends that the Commission convene a technical workshop among Commission staff and interested parties, modeled on the technical working groups often convened to develop updates on the Commission's General Orders. At the technical workshop, informal documentation protocols may be worked out and then approved by the staff or Commission as appropriate without the need to delay promulgation and enforcement of the EPS.

Question 19. Staff Straw Proposal raises the issue of how to attribute emissions factors to renewable resources that have sold off their renewable energy credits (e.g., to municipal utilities) for the purpose of applying the EPS.

PG&E COMMENT: PG&E agrees with the Draft Report's recommendation that renewable power that has been stripped of its RECs be treated as an unspecified or system power contract for purposes of the EPS.

V. CONCLUSION

PG&E respectfully requests that the Commission adopt an EPS consistent with the comments and recommendations provided above.

Respectfully Submitted,

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PACIFIC GAS AND ELECTRIC COMPANY

Dated: September 8, 2006

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of “**COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E) ON DRAFT WORKSHOP REPORT**” on the parties listed below and the parties listed in the official service list for R.04-04-009 by

- transmitting an e-mail message with the document attached to each party on the official service list providing an email address; or
- by first-class mail, postage prepaid, to each party on the official service list not providing an email address.

Executed on September 8, 2006, at San Francisco, California.

/s/
MARTIE L. WAY

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
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Order Instituting Rulemaking to Implement the
Commission's Procurement Incentive Framework and to
Examine the Integration of Greenhouse Gas Emissions
Standards into Procurement Policies.

Rulemaking 06-04-009

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